

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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| | : |
| UNITED STATES OF AMERICA, | : |
| | : |
| -against- | : |
| | : |
| STEVEN DONZIGER, | : Case No. 19 CR 561 (LAP) |
| | : 11 CV 691 (LAK) |
| | : |
| Defendant. | : |
| | : |
| | : |
| -----X | |

**DECLARATION OF REED BRODSKY IN SUPPORT OF NON-PARTIES GIBSON,
DUNN & CRUTCHER LLP AND CERTAIN PARTNERS' MOTION TO QUASH
SUBPOENAS SERVED UNDER FEDERAL RULE OF CRIMINAL PROCEDURE 17(C)**

I, Reed Brodsky, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746,
that the following is true and correct:

1. I am a member of the bar of this Court and a partner at the law firm of Gibson, Dunn & Crutcher LLP (“Gibson Dunn”), counsel to Gibson Dunn, Randy M. Mastro, Andrea E. Neuman, William E. Thomson, and Anne M. Champion in the above-captioned action.

2. Attached hereto as **Exhibit A** is a true and correct copy of the subpoena served on Gibson Dunn on April 29, 2021.

3. Attached hereto as **Exhibit B** is a true and correct copy of the subpoena served on Randy M. Mastro on April 29, 2021.

4. Attached hereto as **Exhibit C** is a true and correct copy of the subpoena served on Andrea E. Neuman on April 29, 2021.

5. Attached hereto as **Exhibit D** is a true and correct copy of the subpoena served on William E. Thomson on April 29, 2021.

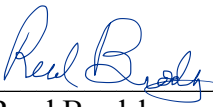
6. Attached hereto as **Exhibit E** is a true and correct copy of the subpoena served on Anne M. Champion on April 29, 2021.

7. On May 2, 2021, I conferred with counsel for Defendant Steven Donziger via telephone and explained why the subpoenas served on Gibson Dunn, Anne M. Champion, Randy M. Mastro, Andrea E. Neuman, and William E. Thomson were improper under Federal Rule of Criminal Procedure 17(c). However, in the interests of reaching an accommodation, I offered to provide: (a) communications between Gibson Dunn and Rita Glavin, Brian P. Maloney, Sareen K. Armani relating to this case from April 15, 2019 to the present, and (b) a log of meetings between Anne M. Champion, Randy M. Mastro, Andrea E. Neuman, and/or William E. Thomson, and Rita Glavin, Brian P. Maloney, and/or Sareen K. Armani from April 15, 2019 to the present, so long as they withdrew their remaining requests which were the most broad, speculative, and in large part subject to privileges. In an email received later that day, Donziger's counsel declined our offer.

8. Gibson Dunn is a law firm with over 1,400 attorneys and approximately 1,000 staff members across 20 offices worldwide.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 3, 2021
New York, New York



Reed Brodsky